

# **APPENDIX A**

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9 Attorneys for Plaintiff WAYMO LLC

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;  
17 OTTOMOTTO, LLC; OTTO TRUCKING  
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF'S RESPONSES AND  
OBJECTIONS TO DEFENDANT UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S THIRD SET OF  
REQUESTS FOR ADMISSION (NOS. 9-23)**

|   |
|---|
| United States District Court<br>Northern District of California<br><b>Trial Exhibit 2835</b><br>Case No. <u>3:17-cv-00939-WHA</u><br>Date Entered _____<br>By _____<br>Deputy Clerk |
|---|

No. 3:17-cv-00939-WHA

WAYMO'S RESPONSES AND OBJECTIONS TO UBER AND OTTOMOTTO'S THIRD SET OF RFAs (Nos. 9-23)

1 **REQUEST FOR ADMISSION NO. 9:**

2 Admit that Anthony Levandowski is the only Google or Waymo employee who received a  
3 payment pursuant to the Project Chauffeur Bonus Program in excess of \$50,000,000.  
4

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

6 Waymo objects to the term “a payment” as vague and ambiguous. Waymo understands the  
7 request as asking whether any Google or Waymo employee was paid in excess of \$50,000,000,  
8 though their participation in the Project Chauffeur Bonus Program. Subject to and without waiving  
9 its objections, Waymo responds as follows:

10 Denied.  
11

12 **REQUEST FOR ADMISSION NO. 10:**

13 Admit that on April 11, 2017, a lawyer for Waymo inspected Uber’s Fuji and Owl  
14 prototypes at 425 Market Street in San Francisco, California.  
15

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

17 Subject to and without waiving its objections, Waymo responds as follows:

18 Admitted.  
19

20 **REQUEST FOR ADMISSION NO. 11:**

21 Admit that on April 19, 2017, a lawyer for Waymo inspected components of Uber’s Spider  
22 at 425 Market Street in San Francisco, California.  
23

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

25 Subject to and without waiving its objections, Waymo responds as follows:

26 Admitted.  
27  
28

**REQUEST FOR ADMISSION NO. 12:**

Admit that on April 19, 2017, a lawyer for Waymo inspected Uber's design files at 425 Market Street in San Francisco, California.

**RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

~~Subject to and without waiving its objections, Waymo responds as follows:~~

Admitted.

**REQUEST FOR ADMISSION NO. 13:**

Admit that on May 24, 2017, Waymo's lawyers inspected Uber's facilities at 737 Harrison Street, 120 Perry Street, and 777 Harrison Street in San Francisco, California.

**RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

~~Subject to and without waiving its objections, Waymo responds as follows:~~

Admitted.

**REQUEST FOR ADMISSION NO. 14:**

Admit that on May 26, 2017, a lawyer for Waymo inspected Uber's source code at 425 Market Street in San Francisco, California.

**RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

~~Subject to and without waiving its objections, Waymo responds as follows:~~

Admitted.

**REQUEST FOR ADMISSION NO. 15:**

Admit that on May 31, 2017, Waymo's lawyers inspected emails belonging to Uber engineers at 425 Market Street in San Francisco, California.

**RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

~~Subject to and without waiving its objections, Waymo responds as follows:~~

Admitted.

**REQUEST FOR ADMISSION NO. 16:**

Admit that on June 6, 2017, a lawyer for Waymo inspected emails belonging to Uber engineers and technical documents at 425 Market Street in San Francisco, California.

**RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

~~Subject to and without waiving its objections, Waymo responds as follows:~~

Admitted.

**REQUEST FOR ADMISSION NO. 17:**

Admit that on June 9, 2017, Waymo's lawyers inspected Anthony Levandowski's work station and Uber-issued smartphone at 555 Market Street in San Francisco, California.

**RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

~~Subject to and without waiving its objections, Waymo responds as follows:~~

Admitted.

**REQUEST FOR ADMISSION NO. 18:**

Admit that on June 12, 2017, Waymo's lawyers inspected the Uber-issued computers of Gaetan Pennecot, Daniel Gruver, and Anthony Levandowski at 737 Harrison Street in San Francisco, California.

**RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

~~Subject to and without waiving its objections, Waymo responds as follows:~~

Admitted.

**REQUEST FOR ADMISSION NO. 19:**

Admit that on June 13, 2017, a lawyer for Waymo inspected emails belonging to Uber engineers and technical documents at 425 Market Street in San Francisco, California.

**RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

Subject to and without waiving its objections, Waymo responds as follows:

Admitted.

**REQUEST FOR ADMISSION NO. 20:**

~~Admit that on June 20, 2017, a lawyer for Waymo inspected Uber's facility at 50 33rd Street in Pittsburgh, Pennsylvania, including the computers of Scott Boehmke and John Bares, and the work spaces of several LiDAR hardware engineers, including Scott Boehmke and Jim Gasbarro.~~

**RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

~~Subject to and without waiving its objections, Waymo responds as follows:~~

~~Denied.~~

**REQUEST FOR ADMISSION NO. 21:**

Admit that on June 28, 2017, Waymo's lawyers inspected emails belonging to Uber engineers and a partial backup of Anthony Levandowski's computer at 425 Market Street in San Francisco, California.

**RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

Subject to and without waiving its objections, Waymo responds as follows:

Admitted.

Objection  
401, 402,  
403M, 403P

Objection  
401, 402,  
403M, 403P

1 **REQUEST FOR ADMISSION NO. 22:**

2 Admit that on June 29, 2017, Waymo's lawyers inspected the Uber-issued computers of  
3 Max Levandowski and Will Treichler and Uber's design files at 737 Harrison Street in San  
4 Francisco, California.

5  
6 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

7 ~~Subject to and without waiving its objections, Waymo responds as follows:~~

8 Admitted.

9  
10 **REQUEST FOR ADMISSION NO. 23:**

11 Admit that on June 29, 2017, Andrew Wolfe inspected Uber's design files at 737 Harrison  
12 Street in San Francisco, California, on behalf of Waymo.

13  
14 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

15 ~~Subject to and without waiving its objections, Waymo responds as follows:~~

16 Admitted.

17  
18 DATED: August 21, 2017

QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

19  
20 By /s/ Charles K. Verhoeven

Charles K. Verhoeven  
Attorneys for WAYMO LLC